

## Wholesale Electricity Market Rule Change Proposal Submission

**RC\_2013\_15**

### Outage Planning Phase 2 - Outage Process Refinements

Submitted by

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Submissions on Rule Change Proposals can be sent by:

Email to: [support@rcpwa.com.au](mailto:support@rcpwa.com.au)

Post to: Rule Change Panel  
Attn: Executive Officer  
C/o Economic Regulation Authority  
PO Box 8469  
PERTH BC WA 6849

1. Please provide your views on the proposal, including any objections or suggested revisions.

#### Issue 4: Balancing Submission unavailability declarations

**RC Proposal:** “For a Non-Scheduled Generator, the ‘available’ quantity provided in its single Balancing Price-Quantity Pair should reflect the Market Participant’s estimate of its MW output *at the end of the Trading Interval*, assuming it is not dispatched down by System Management. The ‘unavailable’ quantity should reflect any Outages but should not include that part of the Sent Out Capacity that is not expected to be reached because its ‘fuel supply’ (e.g. wind or sunlight) is not at an optimal level. The two quantities are not therefore expected to sum to the Sent Out Capacity of the Facility.”

**Collgar Comment:** Collgar’s interpretation of the above proposal (highlighted in red) is that the output at the last second of the interval is required to be submitted. Collgar’s view point is that the average output of the trading interval is much more meaningful. Collgar is supportive of the intent of the proposal otherwise.

## Issue 5: Deadline for approval of a Planned Outage

**RC Proposal:** “The IMO proposes to amend clause 3.19.2 to set the deadline for requesting approval of an Opportunistic Maintenance request to 30 minutes before Balancing Gate Closure for the Trading Interval in which the outage is due to commence. The IMO also proposes to include a new clause 3.19.4A which prescribes that if System Management has not provided a Rule Participant with a decision on a request for approval of a Planned Outage (including a Scheduled Outage or Opportunistic Maintenance) by this time then for the purposes of the Market Rules the request is deemed to be rejected.”

**Collgar Comment:** Collgar is in support of the proposed solution.

## Issue 6: Clarification of requirements for Balancing Facilities (excluding the Verve Energy Balancing Portfolio)

**RC Proposal:** “The IMO proposes to add new clauses 7A.2.8A and 7A.2A.1 to clarify that for non-VEBP Balancing Facilities:

- a Market Participant must, for each of its Balancing Facilities and for each Trading Interval in the Balancing Horizon, use its best endeavors to ensure that, at all times, any of the Facility’s capacity that is:
  - subject to an approved Planned Outage; or
  - *subject to an outstanding request for approval of a Planned Outage,*

*is declared as unavailable in the Balancing Submission for the Facility and the Trading Interval, unless the Balancing Facility is undertaking a Commissioning Test in that Trading Interval; and*
- a Market Participant must, *as soon as practicable* after Balancing Gate Closure for each Trading Interval, for each of its Balancing Facilities that is either an Equipment List Facility or a Small Outage Facility (collectively referred to as an Outage Facility), ensure that it has notified System Management of a Forced Outage *or Consequential Outage* for any capacity declared unavailable in the Facility’s Balancing Submission that:
  - was not subject to an approved Planned Outage or Consequential Outage at Balancing Gate Closure for the Trading Interval; and
  - is not attributable to a difference between the expected temperature at the site during the Trading Interval and the temperature at which the Sent Out Capacity for the Facility was determined.”

**Collgar Comment:** Collgar considers it unreasonable for a Market Participant that wishes to make a request for Opportunistic Maintenance that covers Trading Intervals within the Balancing Horizon to amend its Balancing Submission to make the relevant capacity unavailable before it requests the outage. This is due to the timeframes to lodge and approve opportunistic outages is already onerous. No issues for planned outages.

Based on this, Collgar’s viewpoints are:

- a) Once a Market Participant has lodged an opportunistic maintenance outage for approval, System Management has been notified of potential unavailability. If the request has been approved, the additional unavailability should automatically be

reconciled by internal System Management systems. If this isn't possible, Market Participants should only include unavailability if the outage has been approved. It is This process assumes the request will be approved and if the outcome is rejection, the Market Participant is required to amend the balancing submission again. Additional complexity for Market Participants has been added through the proposed solution.

- b) "as soon as practicable" has not been defined in the Market Rules. Refer to Collgar's response in Section 2.

## **Issue 9: Prohibition on Opportunistic Maintenance Outages spanning two Trading Days**

**RC Proposal:** *The IMO proposes to amend clause 3.19.2 to allow Opportunistic Maintenance requests to be for any period up to 24 hours in length.*

**Collgar Comment:** Collgar is in support of the proposed solution. For non-scheduled generators, clause 3.19.2 has been prohibitive as works cannot commence before 9:30am. Non-scheduled generators are restricted by weather elements amongst other factors and opportunistic maintenance has not been possible on several occasions as a result.

## **Issue 13: Availability declarations for Planned Outage approval requests**

**RC Proposal:** *Requests for extensions of Planned Outages will be managed as a request for a new, separate Planned Outage, and treated no differently from any other Planned Outage request except that the implicit availability declaration prescribed new clause 3.19.2B is not required. The extension outage may be either a Scheduled Outage or an Opportunistic Maintenance Outage.*

**Collgar Comment:** Collgar is in support of the proposed solution. Collgar does believe that there needs to be a bit more flexibility around extension of existing Planned Outages. There can be instances where planned maintenance works encounter problems and genuinely need an extension. The solution would be to verbally notify System Management to enable extension of the existing approved planned outage. Where instances market participants are unable to be granted an extension, a forced outage will be required due to the unavailability.

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### **2. Please provide an assessment whether the change will better facilitate the achievement of the Wholesale Market Objectives.**

As Collgar highlighted to the AEMO under numerous occasions, it believes the current outage planning, management and lodgment process is too complicated. Collgar can demonstrate the complexity of the current outage management process by using the example below. Western Power Corporation (WPC) required a full shutdown of Collgar's facility on 17 October 2018 to undertake critical works. Collgar scheduled outages either side of the WPC to undertake major annual maintenance works. The following events occurred:

- The Collgar maintenance works identified additional complications and therefore required an extension on the scheduled planned outage, and an increase in

unavailability.

- The WPC outage was also extended on the day.
- The scheduled planned outage on 19 October 2018 was no longer required for the period requested was no longer valid. The complexity encountered required an extension of the existing outage (#240998) which was not possible. A forced outage was therefore incurred, and an opportunistic maintenance was requested for the balance of the outage. The proposal to allow an opportunistic maintenance to be approved for periods of <24hrs duration would have been beneficial in this instance.

OUTAGE ID	START TIME	END TIME	PARTICIPANT CODE	STATUS	REASON	OUTAGE (MW)	DESCRIPTION
241872	15/10/2018 4:00	15/10/2018 18:30	COLLGAR	Approved	Forced	54	Balance of Plant Maintenance 2018
240994	15/10/2018 4:00	16/10/2018 21:30	COLLGAR	Approved	Scheduled (Planned)	52	Balance of Plant Maintenance 2018 1 of 4
241873	16/10/2018 8:00	16/10/2018 15:30	COLLGAR	Approved	Forced	9	Balance of Plant Maintenance 2018
241628	16/10/2018 22:00	17/10/2018 3:30	COLLGAR	Approved	Forced	52	Transformer maintenance
240995	17/10/2018 4:00	17/10/2018 21:30	COLLGAR	Approved	Scheduled (Planned)	206	Balance of Plant Maintenance 2018 2 of 4
241874	17/10/2018 22:00	17/10/2018 23:00	COLLGAR	Approved	Consequential	154	Western Power Planned Outage (Western Power ENAR 351047).
240998	17/10/2018 22:00	18/10/2018 21:30	COLLGAR	Approved	Scheduled (Planned)	52	Balance of Plant Maintenance 2018 3 of 4
241666	18/10/2018 22:00	19/10/2018 7:30	COLLGAR	Approved	Forced	52	BOP maintenance
240999	19/10/2018 4:00	19/10/2018 21:30	COLLGAR	Cancelled By Market Participant	Scheduled (Planned)	52	Balance of Plant Maintenance 2018 4 of 4
241667	19/10/2018 8:00	19/10/2018 13:00	COLLGAR	Approved	Opportunistic Maintenance (Planned)	52	BOP maintenance

In addition to above responses, Collgar would like to reiterate its proposals in relation to Clause 3.21.7 of the WEM Rules which states:

*“Notwithstanding the requirements of clause 3.21.4 that a relevant Market Participant or Network Operator must inform System Management of a Forced Outage or **Consequential Outage as soon as practicable**, a Market Participant or Network Operator must provide **full and final details** of the relevant Planned Outage, Forced Outage or Consequential Outage to System Management no later than fifteen calendar days following the Trading Day.”*

- “as soon as practicable” should be defined in the Market Rules.
- A consequential outage has been defined as “is an outage of either a Facility or item of equipment on the list described in clause 3.18.2 **or a facility or generation system to which clause 3.18.2A relates for which no approval was received from System Management.**” There is ambiguity in the reference to 3.18.2A as System Management has previously viewed this as outages that have not received approval. The reference to 3.18.2A is related to Registered Facilities with a Standing Data nameplate capacity of less than 10 MW are not required to schedule outages for that

equipment in accordance with this clause 3.18 and clauses 3.19 and 3.20. A consequential outage could be reworded to “an outage of either (a) a Facility or item of equipment on the list described in clause 3.18.2; or (b) a registered facility or generation system to which clause 3.18.2A relates; for which no approval has been received from System Management.

- c) Full and final details can be lodged, however; may not always be ‘correct or accurate’. Best efforts are made at the time of lodgment of outages. In some instances, the reasons for an outage may be complicated and require further analysis of the events leading to the outage before being able to determine the outage classification. This process could take >15 days. A market participant should have the ability to lodge the details after 15 days so at least the information is captured.

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**3. Please indicate if the proposed change will have any implications for your organisation (for example changes to your IT or business systems) and any costs involved in implementing these changes.**

N/A

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**4. Please indicate the time required for your organisation to implement the change, should it be accepted as proposed.**

N/A

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